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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

MARY PURCELL,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JAMES LOPEZ, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, on or about September 10, 2011, the defendant MARY PURCELL did, through the use of the telephone, an instrument of interstate and foreign commerce, knowingly and willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an alleged attempt to be made to kill, injure, and intimidate an individual, and unlawfully to damage and destroy a vehicle and other real and personal property, by means of an explosive, to wit: the defendant claimed there was a bomb aboard Southwest Airlines Flight 2475, in violation of Title 18, United States Code, Section 844(e).

(Title 18, United States Code, Section 844(e))

TO BE FILED UNDER SEAL

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANT

(T. 18, U.S.C., 844(e))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I have been a Special Agent with the FBI for approximately 12 years, during which time I have participated in various investigations, including investigations related to airport security, national security and the transportation of weapons or explosive devices on airplanes. The information contained in this affidavit is based on discussions with other Special Agents with the FBI and law enforcement officers, and a review of the evidence related to this investigation.

2. On September 10, 2011, at approximately 8:30 a.m. and 9:40 a.m., the Tucson Airport Authority Police ("TAAP") received two telephone calls from an anonymous female, who stated, in sum and substance, that she overheard her boyfriend and several other individuals discussing a bomb plot targeting Southwest Airlines Flight 2475 ("Flight 2475").² TAAP immediately called bomb squad technicians and notified the FBI of the threat. Law enforcement officers at the Tucson Airport removed all of the luggage from the aircraft and the officers, assisted by nine K-9 units, conducted a thorough search of the aircraft and luggage, but no bomb was found. Additionally, the

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest the defendant, I have not described all the relevant facts and circumstances of which I am aware.

^{2/} On September 10, 2011, Southwest Airlines operated a regularly-scheduled flight from Las Vegas, Nevada to Tucson, Arizona to Albuquerque, New Mexico to Baltimore, Maryland, which then connected to Islip, New York, which was scheduled to depart Tucson at 11:00 a.m.

passengers were double-screened, the hand luggage was rechecked and swabbed for explosives, with negative results. Further, the security level surrounding the entire Tucson Airport was increased.

3. After TAAP notified the FBI about the bomb threat, the FBI conducted an investigation, which determined that the bomb threat telephone calls originated from a landline telephone number (631) 588-6049, which was registered to Margaret Meyer at 8 Gail Drive, Lake Ronkonkoma, New York. Additionally, the investigation determined that Margaret Meyer and her son, William Meyer, were scheduled passengers on Flight 2475.


4. On September 10, 2011 at approximately 4:30 p.m., I responded to 8 Gail Drive, Lake Ronkonkoma, New York and interviewed the defendant MARY PURCELL, who stated, in sum and substance, that: (a) her mother and brother, Margaret and William Meyer, respectively, were scheduled to travel on Flight 2475; (b) she had called Southwest Airlines' customer service line twice from (631) 588-6049, inquiring why Flight 2475 was delayed and whether there was a terror or bomb threat; and (c) during both telephone calls from (631) 588-6049, Southwest Airlines would not inform her the reason for the delay, so she twice hung-up the telephone.

5. After the investigation developed additional information, I re-interviewed the defendant MARY PURCELL, on September 10, 2011 at approximately 8:00 p.m. During the second interview, the defendant admitted, in sum and substance, that,

after the second telephone call to Southwest Airlines, she: (a) called the Tucson Airport directly and stated that she overheard her boyfriend and his friends talking about carrying out a bombing of Flight 2475 when it got to New York; (b) she warned them not to let Flight 2475 depart; and (c) she stated that there was a bomb. During my second interview with her, the defendant also stated that her story about the bomb was false, there was no plot against Flight 2475, and she had made up the story because she did not want her mother and brother flying around the anniversary of the September 11th terrorist attacks.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant MARY PURCELL so that she may be dealt with according to law.

In addition, in order to prevent the flight of the defendant and the destruction of evidence, it is respectfully requested that this Affidavit and the arrest warrant be filed under seal.


SPECIAL AGENT JAMES LOPEZ
Federal Bureau of Investigation

Sworn to before me this
12th day of September, 2011

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK